

ADDENDUM TO THE FACT SHEET
FOR STATE WASTE DISCHARGE
PERMIT NO. ST 6110

GENERAL INFORMATION

Facility: Sharp Laboratories of America, Inc.
5750 NW Pacific Rim Blvd.
Camas, WA 98607

APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on June 24, 2002, and accepted by the Department on July 23, 2002. Public Notice of Application was published on July 14, 2002 and July 21, 2002 in *The Columbian*. Based on a review of the application, the Department has determined that:

- The permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- The Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- The discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

On this basis, the Department has made a tentative decision to reauthorize the permit, subject to input from interested or affected parties.

PERMIT REAUTHORIZATION

This fact sheet addendum and the previous fact sheet accompany the draft permit. The previous fact sheet and the addendum are part of the administrative record and together, explain the basis for the discharge limitations and conditions of the reauthorized permit.

The reauthorized permit, with some administrative corrections as explained in this addendum to the fact sheet is substantively identical to the previous permit issued on April 4, 2001.

PERMIT CHANGES

Besides the obviously necessary changes in the due dates for the required document submittals during the permit term, two changes from the previous permit have been made in the draft permit:

1. The upper pH limit has been raised from 9 in the previous permit, to 11. This change from the previous permit is made at the written request of the City of Camas treatment facility, which recognizes the need for alkalinity in its treatment process. The permitting authority has

determined that this higher limit is not in violation of any other local, state or federal requirement.

2. The previous permit included a monthly monitoring requirement for six toxic metals, with a provision that the requirement would be discontinued after 12 months if it is determined by the permitting authority that metals are not present in significant concentrations. The monitoring results show that the concentrations are well below the limitations set by the owner of the receiving sewage works, which are the pertinent standards. The provision is therefore satisfied, and accordingly the draft permit excludes these toxic metals monitoring requirements.
3. The reporting requirement for discharge monitoring results has been changed from quarterly to monthly.

FACT SHEET CHANGES

Sharp-Camas now employs 408 people, not 500. The research and development laboratory, itself, which is the subject of the permit application, employs about 40 people.

Water usage for air-scrubbing has been drastically reduced by the implementation of a batch reuse system, instead of a continuous-flow makeup system. Batches are dumped automatically when conductivity reaches a predetermined level. According to the applicant, that whereas before the discharge was about 11,000 gallons per day for the LCD lab scrubber, it is now only a batch of 500 gallons in two weeks. Similar reductions have been realized with the other scrubber systems.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

Public Notice of Application was published on July 14, 2002 and July 21, 2002 in the *The Columbian*.

RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 14, 2002, and July 21, 2002, in *The Columbian* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Further information may be obtained from the Department by telephone at (360) 407-6280, or by writing to the address listed above.

APPENDIX B – RESPONSE TO COMMENTS

The Department of Ecology (the Department) received comments from Frank Dick, P.E. from Sharp Microelectronics of the Americas on June 23, 2003. Those comments and the Department's responses are outlined below.

Two of the comments noted typographical corrections. The following corrections were made:

3. Page four of the permit (Summary of Submittals) was corrected to show that discharge monitoring reports are required to be submitted on a monthly basis. This correctly reflects S3.A. of the permit.
4. The Addendum to the Fact Sheet incorrectly identified the City of Washougal as the requestor of the raise in pH limit. That reference has been corrected to show the City of Camas treatment facility.

One comment requested that the Department provide the appropriate wording or a form for the “. . . certification of proper management of toxic organics . . .” as required on page six of the permit. The following wording has been added to the permit.

“Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the control authority.”

This statement may be given as part of a cover letter that accompanies the discharge monitoring report, at the bottom of the discharge monitoring report in the comments section, or as a separate form. The Department will provide a form along with the master discharge monitoring report when the final issuance of this permit is sent to the permittee.